

The FCC's recently published regulations regarding unsolicited fax advertisements lacks clarity and creates an onerous position for professional associations.

By removing the "established business relationship" qualification from the regulation, you force associations to take the unnecessary step of obtaining written consent from an audience which has clearly provided that consent through its volunteer participation as a member.

The association community has already raised numerous concerns about the new regulations that remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership.

In light of these concerns and with so many questions left unanswered, I ask that you stop these new fax regulations before they start.

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